NEVADA DIVISION OF ENVIRONMENTAL PROTECTION
FACT SHEET

(pursuant to NAC 445A.236)

Permittee Name: Ruby Pipeline, LLC.
1001 Louisiana Street
Houston, Texas, 77002

Permit Number: NEV2010515

Locations: Desert Valley Compressor Station
Approximately 43 miles northwest of Winnemucca
Bottle Creek Road
Winnemucca, Humboldt County, Nevada 89445
Township 41N, Range 33E, Section 9

Latitude: 41° 26' 50"N,
Longitude: 118° 16' 37"W

Drinking Water Protection Area / Wellhead Protection Area: The Desert Valley Compressor Station is not located within the 6000' Drinking Water Protection Area (DWPA) of any public water supply well. The facility is not within an established Wellhead Protection Area (WHPA). The Desert Valley Compressor Station evaporation pond is double lined, and incorporates a leak detection system.

General: Ruby Pipeline, LLC holds a permit for the operation of a double-lined, leak-detected evaporation pond at the Desert Valley natural gas compressor station, located approximately 43 miles northwest of Winnemucca, Humboldt County, Nevada. Temperature control of the compression equipment is required. In June, 2011, it was determined that the water from the on-site supply well would require treatment to make it suitable for use in the compressor cooling system. At that time, the Permittee requested modification of the permit to reflect the inclusion of an intermittent reverse osmosis (RO) water treatment waste stream (reject water) in the discharge to the evaporation pond. No other process streams will be discharged to the evaporation pond. Discharge is expected to be a daily maximum of 0.0057 MGD, with a 30-day average of 0.0031 MGD.

The evaporation pond is located about 100 feet east of the compressor. The pond is a square basin, 18,295 square feet or 0.42 acre in area, and 3 feet deep. The upper liner is 60 mil high density polyethylene (HDPE); the secondary liner is 50 mil HDPE. The leak detection collection pipes report to a pre-cast manhole for easy inspection and access.

The compressor coolers will operate intermittently. Additionally, the RO system will operate on an as needed basis. Use of the RO treated water will allow the cooling water to be recycled in the cooling system multiple times before bleed-off of high TDS water is required, thus resulting in a lower discharge of spent cooling water to the evaporation ponds. Intermittent operation of the RO treatment system will result in approximately 3.37 gallons per minute discharge to the evaporation pond during operation. Total Daily Maximum discharge to the evaporation pond is expected to be 3.95 gallons per day. Due to the nature of the cooling process, Total Dissolved Solids (TDS) in the cooler discharge will concentrate to approximately 3,500 mg/L. TDS of the RO reject water is

expected to be approximately 2,000 mg/L. No treatment of the discharge is proposed. Sanitary wastes are handled separately.

Receiving Water Characteristics: Receiving water is groundwater of the state of Nevada. Groundwater is not encountered within 50 feet of the ground surface.

Proposed Discharge Limitations and Monitoring Requirements: The proposed discharge limitations and monitoring requirements are the following:

Table 1: Discharge Limitations and Monitoring Requirements

PARAMETER		DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
		30-Day Average	Daily Maximum	Measurement Frequency	Sample Type
Pond Inflow, MGD (Outfall 001)		0.0031	0.0057	Continuous Record Daily	Flow Meter, Calculation
TDS (mg/L)		---	M&R	Quarterly	Discrete
pH (S.U.)		---	M&R	Quarterly	Discrete
Visual Liner Inspection		---	M&R	Weekly	Discrete
Leak Detection Sump Inspection/Evacuation (gal/day/acre)		---	M&R	Monthly	Discrete, Flow Meter or Estimate
Maximum Liner Leakage Rate (gal/acre/day)		---	500 (1)	Monthly	Flow Meter or Estimate
Leak Detection Sump Fluid	TDS (mg/L)	---	M&R	Each Evacuation Event	Discrete
	pH, (S.U.)	---	M&R	Each Evacuation Event	Discrete
Pond Supernatant	TDS (mg/L)	---	M&R	Semi-Annually (2)	Composite(3)
	pH (S.U.)	---	M&R	Semi-Annually (2)	Composite(3)
	Arsenic (mg/L)	---	M&R	Annually	Composite(3)
	Barium (mg/L)	---	M&R	Annually	Composite(3)
	Cadmium (mg/L)	---	M&R	Annually	Composite(3)
	Chromium (mg/L)	---	M&R	Annually	Composite(3)
	Copper(mg/L)	---	M&R	Annually	Composite(3)
	Lead (mg/L)	---	M&R	Annually	Composite(3)
	Mercury(mg/L)	---	M&R	Annually	Composite(3)
	Nickel(mg/L)	---	M&R	Annually	Composite(3)
	Selenium(mg/L)	---	M&R	Annually	Composite(3)
	Silver(mg/L)	---	M&R	Annually	Composite(3)
	Zinc(mg/L)	---	M&R	Annually	Composite(3)

(1). When leakage in excess of 500 gallons per acre per day is detected, the facility shall notify the Division in writing within five (5) business days, shall cease discharge to the pond, and shall

implement necessary corrective action measures to mitigate the liner leakage.

(2). Sampled in January and July of each year (1st & 3rd Quarters).

(3). A composite sample shall be obtained by combining equal volumes of liquid taken from each corner of the evaporation pond.

M&R = Monitor and Report TDS = Total Dissolved Solids S.U. = Standard Units

Schedule of Compliance: The Permittee shall implement and comply with the provisions of the schedule of compliance after approval by the Administrator, including in said implementation and compliance, any additions or modifications, which the Administrator may make in approving the schedule of compliance.

a. The Permittee shall achieve compliance with all conditions of this permit upon issuance.

b. **By October 1, 2011**, the Permittee shall submit for review and approval an Operations and Maintenance (O&M) Manual, prepared in accordance with appropriate sections of guidance document WTS-2, *Minimum Information Required for an Operation and Maintenance Manual for a Wastewater Treatment Plant*. The O&M Manual shall be submitted to the following address:

Department of Conservation and Natural Resources
Division of Environmental Protection
Bureau of Water Pollution Control
ATTN: Compliance Coordinator
901 S. Stewart Street, Suite 4001
Carson City, Nevada 89701

c. **By October 1, 2011,** the Permittee shall submit to the Division as-built drawings of the permitted pond and associated appurtenances, stamped by a professional engineer registered in the State of Nevada.

Rationale for Permit Requirements: The Division's rationale for the proposed monitoring conditions is as follows:

- *Flow*: Influent flow to the evaporation pond is monitored via flow meters. This ensures appropriate fluid level in the pond.

- *TDS*: The pond contents are sampled quarterly for Total Dissolved Solids (TDS). This parameter is monitored to gain information on pond supernatant quality should a catastrophic leak in the liner system occur

- *pH*: The pond contents are sampled quarterly for pH. This parameter is monitored to gain information on pond supernatant quality should a catastrophic leak in the liner system occur

- *Metals*: The pond contents are sampled semi-annually for eleven metals. These parameters are monitored to gain information on pond supernatant quality should a catastrophic leak in the liner system occur

- *Leak Detection Sump*: On a monthly basis, the pond sump is pumped and totalized. This will allow the Permittee and the Division to determine if excess leakage is present, and ensures that appropriate liner repairs are made on a timely basis.

Procedures for Public Comment: The Notice of the Division's intent to issue the discharge permit to Ruby Pipeline, LLC authorizing the operation of the Desert Valley compressor station evaporation pond, subject to the conditions contained within the permit is being sent to the **Reno Gazette Journal** and the **Humboldt Sun** for publication. The notice is being mailed to interested persons on our mailing list. Anyone wishing to comment on the proposed permit can do so in writing for a period of thirty (30) days following the date of publication of the public notice in the newspaper. The comment period can be extended at the discretion of the Administrator. The deadline date and time by which all comments are to be submitted (via postmarked mail or time-stamped faxes, e-mails, or hand-delivered items) to the Division is **August 25, 2011 by 5:00 P.M.**

A public hearing on the proposed determination can be requested by the applicant, any affected State, any affected interstate agency, the Regional Administrator or any interested agency, person or group of persons.

The request must be filed within the comment period and must indicate the interest of the person filing the request and the reasons why a hearing is warranted.

Any public hearing determined by the Administrator to be held must be conducted in the geographical area of the proposed discharge or any other area the Administrator determines to be appropriate. All public hearings must be conducted in accordance with NAC 445A.238.

The final determination of the Administrator may be appealed to the State Environmental Commission pursuant to NRS 445A.605.

Proposed Determination: The Division has made the tentative determination to issue the modified discharge permit NEV2010515 for the remainder of the five (5) year permit period.

Prepared by: Janine O. Hartley, P.E.
Bureau of Water Pollution Control
Draft: July 2011
Final: